



U.S. Department
of Transportation
**Research and
Special Programs
Administration**

400 Seventh St., S.W.
Washington, D.C. 20590

DEC 23 2002

Mr. John Rhodes
Barr Incorporated
P.O. Box 1879
Memphis, TN 38113

Ref No. 02-0281

Dear Mr. Rhodes:

This is in response to your October 16, 2002 letter asking if the Research and Special Programs Administration (RSPA) would consider the separation of the corrosive class into two divisions; i.e., materials that are corrosive only to metals and materials that are corrosive only to skin.

Currently, neither this Office or the United Nations Committee on the Transport of Dangerous Goods (U.N. Committee) is considering the separation of Class 8 (Corrosive) materials into two or more divisions. In fact, the U.N. Committee has considered this issue in the past and decided that separation is not necessary. If you wish to provide this information to your customers, you are permitted to add additional information, such as "skin corrosive only" following the required shipping descriptions on shipping papers and package markings..

I hope this information is helpful. If we can be of further assistance, do not hesitate to contact us.

Sincerely,

Delmer F. Billings
Chief, Standards Development
Office of Hazardous Materials Standards



020281

173.136



Foster
§ 173.136
Definitions
02-0281

October 16, 2002

U.S. Department of Transportation
Research and Special Programs Administration
Office of Hazardous Materials Safety
400 7th Street, S.W.
Washington, DC 20590

Attn: Hattie L. Mitchell

To Whom It May Concern:

My question is, would RSPA consider the separation of the corrosive class into two parts; those materials that are corrosive to metals and those that are corrosive to the skin only?

My company packages paint removers for use with various types of paint and, on various types of materials. Some of these removers are corrosive, others are flammable to some degree. None of these are corrosive to metal, only to your skin.

The reason I ask is, we have had a good number of our customers, that export our removers, ask if the ones that are corrosive; are they corrosive to the skin or metal.

I look forward to your comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Rhodes", written over a light, textured background.

John Rhodes

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